

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

---

MELVIN INGRAM;	JACOB GREENWELL;	DARRELL ONSBY;
SHANTEL ADAMS;	LAWONDA HODGES;	FREDERICK RAYFORD;
DAVID BECK;	LAROME HUMPHREY;	JOHN RILES;
DWYANE BOWENS;	ROBERT KATALTEPE;	ASHLEY ROBERTSON;
ALFREDO CARDENAS;	JOHN LINTNER;	DEANDRE ROSSER;
VERONICA CLEAVES;	KEESHA MCCLINTON;	DUSTIN RUSSELL;
MARCUS COCHRAN;	LAKISHA MCCOY;	PATRICK SHAW;
ROBERT COLUCCI;	CLIFTON MCCOY;	CEDRIC TAYLOR
LESLIE CREWS;	DEDRECK MCVAY;	JESSE TOWNSEND; and
ERIC FLAKE;	HARRY OLIVER;	STEVEN WESBY;

|  
Individually and as potential class  
Representatives for all similarly  
Situated claimants

**PLAINTIFFS**

**VS.**

**NO: 17-cv-2795**

BILL OLDHAM, in his individual capacity )  
and in his official capacity as the Sheriff of )  
Shelby County, Tennessee; ROBERT )  
MOORE, in his individual capacity and in )  
his official capacity as the Jail Director of )  
the Shelby County, Tennessee; CHARLENE )  
McGHEE, in her individual capacity and in )  
her official capacity as the of Assistant Chief )  
Jail Security of Shelby County, Tennessee; )  
DEBRA HAMMONS, in her individual )  
capacity and in her official capacity as the )  
Assistant Chief of Jail Programs of Shelby )  
County, Tennessee; SHELBY COUNTY, )  
TENNESSEE, a Tennessee municipality; )  
and TYLER TECHNOLOGIES, INC., a )  
foreign corporation, and other unknown )  
and unnamed Individuals and Entities, )

**DEFENDANTS**

---

**JOINT STIPULATION IN RE: PLAINTIFFS UNNAMED  
IN CONSOLIDATED CLASS ACTION COMPLAINT**

---

THE PARTIES JOINTLY STIPULATE AS FOLLOWS:

- 1) On March 9, 2018 (Doc. 89) this Honorable Court issued an order granting Defendants' Motion to Consolidate the instant action with *Powell et al. vs. Shelby County et al.* (16-cv-2907).
- 2) The Consolidated Complaint is likely to reduce the number of originally named Plaintiffs in the instant action from thirty (30) to three (3).
- 3) If class certification is granted in the consolidated case, the removal of these twenty-seven (27) individuals as named lead Plaintiffs in the consolidated complaint shall not prejudice any such individual's rights if any such individual is determined to be a member of any certified class.
- 4) If class certification is denied in the consolidated case, the removal of these twenty-seven (27) individuals as named lead Plaintiffs in the consolidated complaint shall not prejudice any such individual's rights to pursue an individual claim, to the extent permitted by applicable law.

**COUNSEL FOR PLAINTIFFS**

**Respectfully submitted,**

/s/ Daniel O. Lofton  
DANIEL O. LOFTON, BPR#27386  
2400 Poplar Ave., Ste. 210  
Memphis, TN 38112  
(901) 526-7837 Phone  
dlofton@craigandloftonlaw.com

/s/ Steve Wilson  
STEVE G. WILSON, BPR#28460  
5100 Poplar Ave., Ste. 2700  
Memphis, TN 38137  
steve@stevewilsonfirm.com

/s/ Matt C. Gulotta  
MATTHEW C. GULOTTA, BPR#28194  
202 Adams Avenue

Memphis, TN 38103  
matt@gulottalaw.net

*Attorneys, Plaintiffs/Class Representatives*

**Stipulated to**

**/s/Bradley Trammell**

Bradley Trammell

Atty. For Tyler Technologies

**Stipulated to,**

**/s/Odell Horton**

Odell Horton

Atty. For Shelby County

**CERTIFICATE OF SERVICE**

I, Daniel Lofton, do hereby certify that I have conveyed a true and correct copy of the foregoing to all counsel of record on this the 7th day of June, 2018.

Submitted,

**/s/ Daniel O. Lofton**  
DANIEL O. LOFTON